

EXHIBIT 2

DECLARATION OF EMILIO UGUETO

Emilio Ugueto, being duly sworn, declares and states:

1. My name is Emilio Ugueto. I am an attorney in Venezuela in good standing. I am currently counsel for Southern Procurement Services LTD. and Chemplast Steel Industries Metals, LTD. (“Applicants”).
2. I am fluent in both English and Spanish.
3. I submit this declaration in support of Applicants’ 28 U.S.C. § 1782 application (“Application”) for an order requiring Castleton Commodities International LLC (“CCI”) to produce documents for use in an ongoing criminal investigation before the Venezuelan government and imminent arbitration proceedings in Switzerland.
4. I have reviewed the Application and can verify that the facts contained therein are true and correct.
5. In 2017, Applicants met with CCI to discuss entering into a contract with CCI or Elemento Ltd. (“Elemento”) for the sale and shipment of certain crude oil and petroleum products. At the time, CCI emphasized that Elemento was CCI’s exclusive representative in Venezuela. Because Applicants had never worked with Elemento, CCI provided Applicants with assurances that Elemento was a reputable business partner. Applicants then entered into and executed the Purchase Agreement with Elemento on October 18, 2017 (“Purchase Agreement”). CCI’s representations concerning Elemento were critical to Applicants in executing the Purchase Agreement.
6. Under the Purchase Agreement, Applicants sold certain crude oil and petroleum cargo to Elemento and Elemento agreed to deliver the cargo to specific ports in the United



States. Elemento frequently operated under CCI's name and even included CCI (and CCI-related entities) in discussions and activities relating to the Purchase Agreement.

7. Elemento failed to comply with its obligations under the Purchase Agreement, and specifically failed to make payment of amounts owed to Applicants. Upon information and belief, CCI was aware of and assisted in Elemento's non-compliance.

8. After reviewing certain communications, tracking information, and a number of records, Applicants discovered that Elemento (with the knowledge and assistance of CCI) repeatedly and wrongfully re-routed certain shipments of Venezuelan petroleum provided by Applicants pursuant to the Purchase Agreement. Elemento (with the knowledge and assistance of CCI) also presented forged documents to Petróleos de Venezuela, S.A. ("PDVSA"), the Venezuelan state-owned oil and natural gas company, in an effort to conceal the true destinations of these shipments. The forged documents inaccurately state that Elemento had delivered its cargo to the proper (and contractually compliant) destination.

9. Applicants also believe that CCI and its executives may have benefitted monetarily from this re-routing scheme.

10. The Office of the Attorney General of Venezuela is currently investigating the repeated, wrongful re-routing of shipments under the Purchase Agreement and the forgery of related documents. Specifically, the Office of the Attorney General is currently conducting an ongoing criminal investigation of Elemento, CCI, and others in relation to their respective roles in the re-routing scheme and forgery of documents. The Attorney General's investigation may lead to criminal charges against Elemento, CCI, and others.

11. In connection with the above criminal investigation, Venezuelan authorities have sought information from Applicants.

12. Applicants have, at all times, complied with the Venezuelan government's investigations.

13. Applicants now file the Application in order to request additional information to provide the Venezuelan government concerning CCI's relationship with Elemento, as well as CCI's role in potential wrongdoing related to the Purchase Agreement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Caracas on August 22, 2018.



Emilio Ugueto
Legal Counsel
Southern Procurement Services, Ltd.
Chemplast Steel Industries Metals, Ltd.